

Application No.: 10/772,327

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Docket No.: 333772000900

**REMARKS**

Claims 1-24 stand examined and are rejected on various grounds. These rejections are addressed in the appropriate sections below. In view of the preceding amendments and the remarks made herein, the present application is believed to be in condition for allowance.

**Response to the Examiner's Comments**

In the non-final Office Action dated June 14, 2005, Applicants argued that the Arkin (U.S. 6,028,439) reference does not disclose the site controller of the present invention. In the final Office Action dated October 3, 2005, the Examiner argued that the microcontroller (see Arkin, Fig. 2, 30) is the site controller of the present invention, Applicants respectfully disagree. Applicants submit that Arkin discloses a tester system having the structure of **Host-Test Module (s)-DUT(s)**, which is shown in Figure 1 of the Arkin reference. However, the present invention discloses a tester system having the structure of **System Controller-Site Controller(s)-Test Module(s)-DUT(s)**, which is shown in Figure 2 of the present application. The microcontroller (see Arkin, Fig. 2, 30) within each test module (see Arkin, Fig. 1, 14) is part of the test module, which is not the site controller of the present invention. Because the site controller is not found in the Arkin reference, the Arkin reference does not teach or disclose at least some of the features of the site controller of the present invention, such as the ability to run on a different local operating system, to be coupled to multiple test modules, and to have different hardware implementations, as described in the response to the non-final Office Action.

In the final Office Action, the Examiner stated that the at least one local operating system is taught by the computer bus (Fig. 2, 38A), Applicants respectfully submit that this assertion is incorrect. A person of ordinary skill in the art at the time of the invention would not consider the computer bus as a local operating system, which typically includes computer program codes, of a tester system.

In summary, the Arkin reference describes a closed tester architecture where vendor-specific operating system and software are used in controlling the tester system. The closed tester

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architecture uses dedicated hardware and software, such as a common master clock (MCLK, see Arkin, Fig. 1, 15), to test a particular device-under-test (DUT). On the other hand, the present invention describes an open architecture tester system, where hardware and software framework of the tester system that include standard interfaces are described that allow test modules from different vendors to interact with each other in a plug-and-play manner. In light of the open architecture tester system, Applicants also submit that the Arkin reference does not teach or disclose the system controller of the present invention.

In the interest of expediting the allowance of the present application, Applicants have amended the independent claim 1 to include the limitation of "wherein the associated site controller controls at least one test module interactively in a plug-and-play manner." The detailed arguments are presented below.

**Rejections under 35 U.S.C. § 102(b):**

Claims 1-5 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 6,028,439 to Arkin et al. Applicants respectfully traverse these rejections.

As amended, the Arkin reference does not teach or disclose the claim element "wherein the associated site controller controls at least one test module interactively in a plug-and-play manner." As shown in Figure 1 and Figure 2 of the Arkin reference, the microcontroller (Fig.2, 30) is within the test module (Fig. 1, 14), thus the test module can not be detached and/or attached from the microcontroller interactively in a plug-and-play manner. This is consistent with Applicants previously presented arguments that the site controller and the test module are different entities, and the Arkin reference does not teach or disclose the site controller.

**Rejections under 35 U.S.C. § 103(a):**

In the Office Action, claims 6-8, 24 are rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin et al. in view of Published Application US 2002/0183955 A1 to Adler; claims 9-14, and 19 are rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin and

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Adler as applied to claims 6-8, and further in view of Hejlsberg et al (US 2003/0167277); claims 15- 18, 21-23 are rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin, and claim 20 is rejected under 35 U.S.C. § 103 as being allegedly obvious over Arkin, Adler, and Hejlsberg as applied to claims 9-14 and 19, and further in view of Shah (6,782,336).

In response, for at least the reasons presented above, since the Arkin reference does not disclose each and every element of the independent claim 1, its dependent claims 2-24 can not be found obvious over Arkin et al. in view of cited references to Adler, Hejlsberg, and Shah.

**Support for the Amended Claim 1:**

The support for the amended claim 1 is found in paragraph [0009], Figures 2 and 3, and their corresponding descriptions.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket No. 333772000900. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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